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September 24, 2021

BY ECF

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

Re: United States v. Marcus Chambers, 20 Cr. 572 (NSR)

Dear Judge Román,

I write to respectfully request an additional three-week extension with which to file motions in the above-captioned matter. The Government and the undersigned have been in discussions concerning a disposition and while we have not come to an agreement, our discussions have been productive. We need this time to review rather complicated terms with our client. I have consulted with the Government and there is no objection to this request. We agree that this time should be excluded from speedy trial calculations as we continue to review discovery and engage in plea discussions.

Respectfully submitted,

/s/

James Kousouros, Esq.

c.c.

Christopher Brumwell
Olga Zverovich
Assistant United States Attorneys

Deft. Chambers's (01) request, joined by Deft. Kidd (02), for an extension of the motion briefing schedule is GRANTED without objection by the Gov't as follows: moving papers shall be filed Oct. 18, 2021; Gov't's response shall be filed on Nov. 17, 2021; and reply papers shall be filed on Dec. 8, 2021. Counsel shall provide two hard courtesy copies to the Court as their respective papers are filed. The telephonic Status Conf. is adjourned from November 18, 2021 until January 6, 2022 at 12:00 pm or, alternatively, for January 4, 2022 at 12:00 pm. Clerk of Court requested to terminate the motions (docs. 37 & 39). Dated: Sept. 28, 2021

SO ORDERED:

HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

MEMO ENDORSED

